



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*26 Federal Plaza, 37th Floor
New York, New York 10278*

March 21, 2025

The Honorable Arun Subramanian
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Combs*, S2 24 Cr. 542 (AS)

Dear Judge Subramanian:

The Government respectfully submits this letter regarding two issues relating to the Court's pretrial schedule that have arisen in the above-referenced matter.

A. Expert Notice

The Court ordered the parties to provide expert notice on the following schedule: the Government was ordered to provide notice on March 7, 2025; the defense was ordered to provide notice on March 14, 2025, and rebuttal notice was scheduled for March 21, 2025. *See* Dkt. 125 at 1. The Government provided its expert notice to the defense on March 7, 2025. On March 18, 2025, the parties engaged in a meet and confer, during which the defense informed the Government that it intends to provide notice by March 21, 2025 of a rebuttal expert.¹ The Government therefore respectfully requests, with the consent of the defense, to have until March 28, 2025 to amend its expert notice as necessary to respond to the defense's notice.

In addition, in a meet and confer on March 20, 2025, the defense also informed the Government that it intends to ask the Court to extend its deadline to provide notice of a potential pharmacological expert until March 31, 2025. The Government does not object to this extension but requests that if granted by the Court, the Government be permitted until April 7, 2025 to provide notice of a rebuttal expert and, if necessary, to move to preclude the defendant's proposed expert testimony after the April 1 deadline for motions *in limine*. The defense has no objection to these requests.

B. Victim Pseudonyms

The Government has conferred with the defense regarding the use of pseudonyms for some of the victims the Government intends to call at trial, consistent with the practice in this district in

¹ Specifically, the defense informed the Government that it intended to move to preclude the Government's sex trafficking expert and that it would call a rebuttal expert if that motion was denied.

similar cases. The defense objects to the use of pseudonyms for these particular witnesses. The Government therefore intends to file a motion *in limine* on this topic on April 1, 2025, and respectfully requests that the Court decide that motion as expeditiously as possible once it is fully briefed. The use of pseudonyms implicates multiple logistical concerns, including, among other things, the redaction of a substantial volume of exhibits, preparation of witness testimony, and proposed voir dire. If the Court permits certain victims to testify under a pseudonym, the Government would also request a conference in advance of the final pretrial conference to discuss these logistics.

Respectfully submitted,

MATTHEW PODOLSKY
Acting United States Attorney

By: _____/s
Maurene Comey / Meredith Foster /
Emily A. Johnson / Christy Slavik /
Madison Reddick Smyser / Mitzi Steiner
Assistant United States Attorneys
(212) 637-2324/-2310/-2409/-1113/-2381/-2284